

**STEVEN Z. LEGON**

*Attorney At Law*

20 VESEY STREET

NEW YORK, NEW YORK 10007

TEL. (212) 791-0613 FAX. (212) 964-2926

[slegon@aol.com](mailto:slegon@aol.com)

December 6, 2024

Hon. Vernon S. Broderick  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**APPLICATION GRANTED  
SO ORDERED**   
**VERNON S. BRODERICK**  
**U.S.D.J.** 12/06/2024

**Re: *United States v. Calvin Darden, Jr.,*  
23 Cr. 134 (VSB)**

Dear Judge Broderick:

This letter motion is submitted to request a temporary modification of conditions of bail in the above-referenced matter to permit the defendant, Calvin Darden, Jr., to travel to New York City to accompany his elderly parents to New York, so that his father, Calvin Darden, Sr., may attend medical appointments at the Center of Excellence for Multiple Myeloma at the Mount Sinai / Tisch Cancer Center. Calvin Darden, Sr. has an initial appointment scheduled for Monday, December 9, 2024, and a second appointment scheduled for Tuesday, December 10, 2024. If permitted to travel, Calvin Darden, Jr. would fly with his parents from Atlanta to New York during the afternoon of Sunday, December 8, 2024, and would return to Atlanta on the morning of Wednesday, December 11, 2024. Additionally, Calvin Darden, Jr. would seek to book hotel rooms for himself and his parents at a hotel as close as possible to Mount Sinai hospital, and would provide his travel itinerary, once made, to Senior U.S. Probation Officer Krystal J. Batchelor, who is responsible for monitoring Calvin Darden, Jr. in the Northern District of Georgia.

The government has been informed of this application and does not have any objection. Additionally, Senior U.S. Probation Officer Krystal J. Batchelor, of the Northern District of Georgia, has been informed of this application, and she does not have any objection. Counsel has also informed SDNY Pretrial Services Officer John Moscato of counsel's intention to file this last-minute application, but has not yet received a reply.

Lastly, should the court grant this application, all other conditions of bail are to remain the same.

Respectfully submitted,



Steven Z. Legon, Esq.

Anthony L. Ricco, Esq.

Xavier Donaldson, Esq.

Erica Ashley Reed, Esq.

*Attorneys for Calvin Darden, Jr.*

cc: All Counsel of Record (By E.C.F.)

cc: U.S. Pretrial Services Officer John Moscato (By Email)

cc: Senior U.S. Probation Officer Krystal J. Batchelor (By Email)